Law Offices

of

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June 30, 2020

July 9, 2020 (revised)

Rosa Maria Styles 43 West 12th Street Avalon, New Jersey 08202

In re: Rosa Maria Styles, Chapter 11, Case # 19-32881-ABA

FOR PROFESSIONAL SERVICES RENDERED in connection with the above referenced matter including the following:

01/16/2020. Receipt and review of emails between debtor and Jeff Sponder, Esquire, relative to retention of counsel by debtor.

02/10/2020. Correspondences and communications with client and her spouse, preparation and entry into retainer agreement.

1.1 hrs

02/10/2020. Provision to client of copy of U.S Trustee Chapter 11 Operating Guidelines for immediate client review. .1 hrs

02/10/2020. Preparation and filing of Application for Retention of Professional (as counsel for debtor) and supporting documents and service of same. (FS)

1.0 hrs

Costs- Copies-40 copies@ \$.20/copy

Postage

\$4.40

02/10/2020. Correspondences and communications with Jeff Sponder, Esquire, of the US Trustee's Office relative to the filed Application for Retention of Counsel. .4 hrs

02/10/2020. Communications with Rebecca McDowell, Esquire, counsel for first mortgagee of Avalon property, relative to said creditor's Stay Vacation Motion relating to said property and indicated that I would be requesting an adjournment of said Stay Vacation Motion so that I could file a Motion to Authorize the Sale of said Avalon property on behalf of the debtor.

.6 hrs

02/11/2020. Appeared at Stay Vacation Motion and agreed with creditor's counsel, to enter into a Consent Order resolving said motion; motion adjourned to 02/25/2020 preliminarily. Discussed the matter with Christopher Fallon, Esquire, attorney for CEBV, LLC.

1.0 hrs
Costs-Parking
\$11.00

Travel (1.0 hrs) \$175.00

02/11/2020. Preparation of Supplemental Certification of Professional in Support of Application for Retention of Professional (debtor's counsel).

02/11/2020. Correspondences and communications with Rebecca McDowell, Esquire, counsel for first mortgagee of Avalon property, relative to sale of Avalon property.1.2 hrs

02/11/2020. Receipt and review of documents including property searches and foreclosure judgment and court order issued by NJ Superior Court regarding said Avalon property declaring recorded third mortgage to debtor's husband's brother, Jerry Schwartz, to be void and of no effect.

.6 hrs

02/12/2020. Review of petition and Docket Report for previous filing under Case # 18-28533-ABA as well as present filing in preparation for 341(a) meeting of 02/13/2020. 2.1hrs Costs-PACER- 86 pages @ \$.10/page = \$8.60

02/12/2020. Communications with Jeff Sponder, Esquire, and filing of Supplemental Certification of Professional in Support of Application for Retention of Professional (debtor's counsel) and new location for 341(a) meeting.

.4 hrs

02/12/2020. Correspondence and communication with Hugh Ward of the US Trustee's Office relative to outstanding Trustee fees; communications with client regarding said outstanding fees.

.2 hrs

02/12/2020. Correspondences and communications with debtor's spouse relative to payment of debtor's Trustee fees and receipt and review of money order and "Pay.gov" receipt. Transmittal of copy of money order and receipt to Hugh Ward. . . . 3 hrs

02/13/2020. Attendance at 341(a) meeting with debtor, Jeff Sponder, Esquire of US Trustee's Office, and Christopher Fallon, Esquire, attorney for CEBV, LLC (including travel time).

Costs- Parking- \$11.00

Travel (1.0 hrs) \$175.00

02/14/2020. Receipt and review of correspondence from Jeff Sponder, Esquire, indicating a listing of necessary petition amendments, documents and/or additional information required from the debtor as noted at 341(a) meeting; transmittal of said list to debtor to provide required information . .5hrs

02/14/2020. Correspondences and communications with Christopher Fallon, Esquire, relative to the claim of CEBV, LLC and receipt and review of Forbearance Agreement

allegedly signed by debtor and her spouse, with CEBV, LLC.

1.4 hrs

02/17/2020. Correspondences and communications with Christopher Fallon, Esquire, relative to the claim of CEBV, LLC and scheduling of conference call with Michael Menkowitz, Esquire, and he to discuss potential resolution of CEBV, LLC claim. .5 hrs

02/18/2020. Review of Claim #3 filed by CEBV, LLC.

.3 hrs

02/18/2020. Participated in conference call with Michael Menkowitz, Esquire and Christopher Fallon, Esquire, of Fox Rothchild, attorneys for CEBV, LLC, relative to potential settlement of CEBV, LLC's claim.

02/18/2020. Contacted and discussed client and her spouse relative to potential settlement proposals.

02/18/2020. Reviewed Claim #4 filed by Bayview Loan Servicing, LLC, relating to the first mortgage on debtor's Sewell, NJ property. .5 hrs

02/21/2020. Preparation of Motion to Sell debtor's Avalon, NJ property. .8 hrs

02/21/2020. Communications with debtor's former foreclosure defense counsel relative to same; received and reviewed documents from debtor's foreclosure defense. . . 7 hrs

02/23/2020. Communications with debtor and her spouse relative to property and judgment searches relating to the title to the Avalon property. .3 hrs

02/23/2020. Drafted Motion for Authorization to Sell debtor's Avalon property and forwarded same to debtor for her review, execution of certification in support of motion and approval to file same.

2.5 hrs

02/23/2020. Communications with client and spouse relative to retention of Special Counsel to file Adversary Proceeding to dispute the extent and validity of the CEBV, LLC claim.

02/24/2020. Received client's signed Certification in Support and authorization to file Motionand filed same; prepared and filed Notice of Proposed Private Sale with Motion.2.1 hrsCosts-Filing fee-\$181.00Copies-665 @ \$.20/copy133.00Postage-19.60

02/24/2020. Correspondences and communications with US Trustee's office regarding Motion to Sell.

02/24/2020. Preparation and filing of Application for Retention of Professional (SEK as Special Real Estate Counsel) for debtor. (FS) .7 hrs

02/24/2020. Correspondences and communications with Jeff Sponder, Esquire, relative to

Application for Retention as Special Real Estate Counsel as well as payment to judgment creditors.

.5 hrs

02/24/2020. Correspondences and communications with Rebecca McDowell, Esquire, counsel for first mortgagee of Avalon property, relative to sale of Avalon property and receipt of proposed Consent Order resolving Stay Vacation Motion; transmittal of same to client for review and approval to sign.

7 hrs

02/25/2020. Communications with Jeff Sponder, Esquire, relative to the proposed payment to judgment creditors indicated in the Motion for Authorization to Sell and whether alternative actions would be necessary relative to dealing with same. . . . 3 hrs

02/25/2020. Appearance for debtor on Motion to Vacate Stay filed by creditor, Welch; same adjourned to 03/24/2020. .3 hrs

Costs- Parking \$11.00

Travel (1 hrs) \$175.00

02/27/2020. Communications with debtor's former foreclosure counsel relative to debtor's sale motion and the claim of CEBV, LLC.

03/2/2020. Follow-up communications from Rebecca McDowell, Esquire, counsel for first mortgagee of Avalon property, relative to consent order; I followed-up with client to request authorization to sign same.

.3 hrs

03/3/2020. Receipt and review of Order Authorizing Retention of Special Real Estate Counsel.

03/9/2020. Receipt of Requirement to File Financial Management Certificate and transmittal of same to client to obtain same for filing with the court.

03/9/2020. Correspondence and communication with Hugh Ward of the US Trustee's Office relative to December, 2019 and January, 2020 MOR's; correspondence and communications with client and spouse regarding same.

03/10/2020. Communications with debtor and spouse to seek additional time to sell the Avalon property. .2 hrs

03/12/2020. Correspondences and communications with other counsel in case relative to status conference; preparation and forwarding of correspondence to Court relative to status conference.

N/C

03/13/2020. Correspondences and communications with Christopher Fallon, Esquire, relative to the claim of CEBV, LLC.

30/13/2020. Receipt of subpoena for D. Cannon and transmittal of same to debtor's former foreclosure counsel for service upon said individual. 1 hrs

- 03/16/2020. Follow-up communications from Rebecca McDowell, Esquire, counsel for first mortgagee of Avalon property, relative to consent order; follow-up with client relative to same.

 .3 hrs
- 03/16/2020. Follow-up with office staff and client regarding items requested by the US Trustee's office.
- 03/16/2020. Receipt and review of email from debtor's spouse.

- .2 hrs
- 03/17/2020. Communications and correspondences with clients. transmittal of information needed to be provided to the US Trustee as per the operating guidelines. .5 hrs
- 03/17/2020. Correspondence with debtor's former counsel relative to the defense of the foreclosure action regarding debtor's Avalon property.

 .3 hrs
- 03/17/2020. Follow-up request to debtor for items requested by U.S. Trustee's Office in connection with the 341(a) meeting. Communications with debtor's spouse. (FS) .5 hrs
- 03/17/2020. Receipt and review of opposition of CEBV, LLC to debtor's Motion for Authorization to Sell her Avalon property; transmittal of CEBV, LLC's documents to client for review and comment/feed-back.

 1.3 hrs
- 03/18/2020. Correspondences and communications with debtor regarding the opposition received from CEBV, LLC and discussion concerning retention of Special Counsel to prosecute Adversary proceeding to dispute the extent and validity of the CEBV, LLC liens and related documents; communications relating to 30/24/2020 Motion return dates. 1.0 hrs
- 03/19/2020. Communications and correspondences with Christopher Fallon, Esquire, relative to setting up conference call with his office concerning the CEBV, LLC claim and opposition to sale motion. Call set for 03/20/2020 at 12:00 pm noon.

 .6 hr
- 03/19/2020. Receipt and review of correspondence from Court relative to adjournment to 04/7/2020 of unresolved motions returnable on 03/24/2020. Forwarding of said information to debtor.
- 03/20/2020. Correspondences and communications with opposing counsel, Melissa J. Brown, Esquire, counsel for D. Cannon, and Jeff Sponder, Esquire, regarding adjournment and rescheduling of matters returnable before the Court on 03/24/2020.
- 03/20/2020. Participation in conference call with counsel for CEBV, LLC relative to attempting to amicably resolve the CEBV, LLC claim.
- 03/20/2020. Communications and correspondences with client in reference to the sale of the property and opposition filed relative to same.

 .5 hrs
- 03/20/2020. Review of correspondence filed by counsel for Thomas Welch relative to Motion for Stay Relief .1 hrs

- 03/20/2020. Follow-up with debtor on proposed Consent Order resolving Stay Relief Motion. Receipt of authorization to sign same on behalf of debtor. Correspondence and communication with Rebecca McDowell, Esquire, counsel for Stay Relief Motion movant, advising of debtor's consent to entering into the Consent Order to amicably resolve motion.
- 03/20/2020. Receipt of revised Consent Order from movant's counsel and transmittal of same to debtor for review and approval to enter into same. .2 hrs
- 03/20/2020. Receipt and review of Court "initial thoughts" on debtor's Motion to Sell and transmittal of same to client for comment/feed-back.
- 03/21/2020. Communications with office staff relative to preparation and drafting of necessary petition amendments. .2 hrs
- 03/23/2020. Research for preparation and filing of Adversary Proceeding against CEBV, LLC to dispute the extent and validity of its claim against debtor. 2.0 hrs
- 0323/2020. Preparation of letter brief relative to issues in the Adversary Proceeding for use therein.
- 03/23/2020. Correspondences and communications with debtor, debtor's spouse and Saul Steinberg, Esquire, attorney for debtor's spouse, relative to proposed Adversary Proceeding. Received notification from debtor of her change in position relative to CEBV, LLC and her desire to negotiate a settlement of said claim with said creditor.
- 03/24/2020. Continued communications with debtor's spouse relative to petition amendments and outstanding information required to be provided to the U.S. Trustee's office. (FS)

 .7 hrs
- 03/24/2020. Received and reviewed correspondence from debtor advising that Saul Steinberg, Esquire, was to lead negotiations with CEBV, LLC relative to settlement efforts and that I would be advised of the efforts and progress relative to same. .2 hrs
- 03/25/2020. Correspondences and communications with debtor and debtor's husband on the motion to sell and the status of the sale. .5 hrs
- 03/31/2020. Communications and correspondences with Bruce Compton on the scheduling of the motion hearings. (FS) .3 hrs
- 03/31/2020. Correspondences and communications with debtor and Saul Steinberg, Esquire, relative to negotiations with CEBV, LLC.
- 04/1/2020. Receipt and review of Motion to Convert or Dismiss Case filed by U.S. Trustee's Office and Order Shortening Time.

- 04/1/2020. Correspondences and communications with Jeff Sponder, Esquire, relative to said motion.
- 04/1/2020. Continued research for adversary proceeding.

1.0 hrs

- 04/2/2020. Numerous communications and correspondences with client relative to compliance with Chapter 11 Operating Guidelines and insurance requirements. 1.0 hrs
- 04/2/2020. Continued research for adversary proceeding.

1.2 hrs

- 04/2/2020. Communication with debtor and her spouse relative to information required for car insurance declaration to comply with the Operating Guidelines. (FS) .5 hrs
- 04/2/2020. Correspondences and communications with debtor and Jeff Sponder, Esquire, relative to satisfying debtor's insurance requirements.
- 04/4/2020. Correspondences and communications with staff and debtor relative to outstanding, signed MOR's.
- 04/6/2020. Filing of Monthly Operating Reports for the months of January, February and March, 2020. (FS) .7 hrs
- 04/6/2020. Correspondences and communications with debtor and Jeff Sponder, Esquire, relative to providing evidence of insurance coverages in accordance with the Operating Guidelines.

 2.0 hrs
- 04/6/2020. Correspondence with opposing counsel relative to U.S. Trustee's motion to dismiss.
- 04/7/2020. Communication with counsel for T. Welch on the status of the sale of the Avalon property. .3 hrs
- 04/7/2020. Correspondences and communications with Jeff Sponder, Esquire, and Rebecca McDowell, Esquire, relative to the adjournment of the Motion to Convert or Dismiss to 4/21/2020.
- 04/8/2020. Communications and correspondences with debtor regarding items needed by the U.S. Trustee for the case to proceed. (FS)
- 04/13/2020. Communications and correspondences with debtor on the status of the items needed for the case to proceed. (FS)
- 04/13/2020. Communications and correspondences with Jeff Sponder, Esquire, relative to outstanding items needed from debtor to enable the case to proceed. (FS) .5 hrs
- 04/15/2020. Review of correspondences from Jeff Sponder, Esquire, regarding outstanding items needed from debtor for case to proceed.

04/15/2020. Drafting of petition amendments.

2.0 hrs

04/16/2020. Communications with debtor and drafting of revised amendments; transmittal of revised draft of petition amendments to debtor for review, approval and signing.

.3 hrs

04/16/2020. Correspondences and communications with debtor and debtor's spouse regarding outstanding U.S. Trustee's fees and payment amounts and dates of same. .5 hrs

04/16/2020. Correspondences and communications with Saul Steinberg, Esquire, relative to U.S. Trustee's motion to dismiss or convert and notifying Mr. Steinberg that I was receiving notices of "undelivered mail returned to sender" for emails transmitted to debtor's email address relating to the Motion to Dismiss and requests for information/documentation needed to rectify the situation.

1.2 hrs

04/16/2020. Receipt of email from debtor's spouse alleging that my representation to Mr. Steinberg regarding debtor's ability to receive emails was "fabricated" despite my receiving said notices of "undelivered mail returned to sender."

04/17/2020.Filing of amended schedules. (FS)
Costs- Filing fee

.5 hrs \$31.00

04/17/2020. Correspondences and communications with debtor and Saul Steinberg, Esquire, relative to U.S. Trustee's request for amendments, verification of auto insurance for the vehicle debtor drives and missing Operating Guideline requirements as well as upcoming motion to dismiss or convert and for.

3.0 hrs

04/17/2020. Correspondences and communications with debtor and Saul Steinberg, Esquire, relative to stay vacation by T. Welsh, 1st and 2nd mortgagee of Avalon property. ... 8 hrs

04/17/2020. Communications with Rebecca McDowell, Esquire, relative to sale of debtor's Avalon property. .4 hrs

04/17/2020. Communications with law office of Cory Gilman, Esquire, attorney for the buyers, regarding status of sale of debtor's Avalon property. .5 hrs

04/17/2020. Correspondences and communications with debtor and debtor's spouse regarding outstanding items required by the U.S. Trustee. Receipt and transmittal of numerous outstanding documents required from debtor to Jeff Sponder, Esquire. 1.0 hrs

04/17/2020. Correspondences and communications with Mr. Sponder. Relative to Motion to Dismiss or Convert.

04/17/2020. Correspondences and communications with Rebecca McDowell, Esquire, relative to sale of debtor's Avalon property.

04/17/2020. Correspondences and communications with Saul Steinberg, Esquire regarding opposition to Stay Vacation Motion of T. Welch, and filing same with the Court.

.5 hrs

04/18/2020. Filing of MOR for the month of December, 2019. (FS)

04/19/2020. Communications and correspondences with proposed accountant, Anthony Nini, CPA, on behalf of debtor including discussions of the need for his services in assisting the debtor in properly addressing and satisfying the requirements of the Operating Guidelines including filing monthly MOR's in addition to composition of a viable plan.

2.5 hrs

04/19/2020. Research on 28 U.S.C. §157 b (2) and initial preparation of Adversary Complaint.

04/20/2020. Communications and correspondences with Saul Steinberg, Esq. relative to whether alternative counsel would be handling the proposed Adversary action. 1.0 hrs

04/20/2020. Continued drafting of Adversary Complaint; preparation of Summons and Notice of Pretrial Conference. 7.3 hrs

04/20/2020. Correspondences and communications with Jeff Sponder, Esquire, relative to a Rule 9014 Motion and a discussion as to who was involved in the negotiations of the proposed settlement of the claim with CEBV, LLV.

04/20/2020. Correspondences and communications with Jeff Sponder, Esquire, relative to the disparity of the DIP account balance in the March, 2020 MOR, his acknowledgement of receipt of the December 2019 MOR, proof of the debtor being insured under her brother-in-law's auto insurance policy, copies of the debtor's most recently filed federal and state income tax return and proof of a new dip account and the continued need for debtor's pre-petition bank statements, check registers and bank reconciliations for the three month period prior to the filing date for scheduled bank accounts at TD Bank and Republic Bank and proof of closure of the Republic Bank account; Mr. Sponder indicated that the check registers failed to include payment dates, check numbers, payment amounts and payee names for deposits and/or payments.

04/20/2020. Review and submission of required documents to the Trustee regarding the closure of bank accounts and the opening of DIP accounts. (FS)

1.1 hrs

04/20/2020. Correspondences and communications with debtor, debtor's spouse and Tony Nini, CPA, relative to resolving the issues raised by Mr. Sponder.

1.7 hrs

04/20/2020. Correspondences and communications with Saul Steinberg, Esquire, relative to CEBV, LLC negotiations and claim resolution.

04/20/2020. Completion of draft of Adversary Complaint and transmittal of same to debtor for review, approval and authorization to file.

04/20/2020. Correspondences and communications with debtor and receipt of authorization to file Adversary Proceeding; filed same and Summons and Notice of Pretrial Conference. .3hrs

Costs- Filing fee- \$350.00

04/20/2020. Communications and correspondences with Anthony Nini, CPA in reference to retention.

04/20/2020. Preparation and filing of application for retention of CPA. (FS) .7 hrs

04/21/2020. Review and submission of required documents to the trustee. (FS) .5 hrs

04/21/2020. Communications with Jeff Sponder, Esquire. .1 hrs

04/21/2020. Telephonic appearance on Motion to Convert/ Dismiss. Motion for Stay Relief and Motion to Sell. .5 hrs
Costs- Court Solutions fee to participate virtually- \$50.00

04/21/2020. Receipt of Order Respecting Amendments and compliance with same.(FS) .7hrs

04/21/2020. Communications with Jeff Sponder regarding remaining information required from the debtor to satisfy the U.S. Trustee to enable it to withdraw its motion. ... 3 hrs

04/21/2020. Communications with debtor, debtor's spouse, debtor's spouses' counsel and proposed CPA regarding the list of remaining outstanding items required to be provided and the need for same prior to the hearing on motion to convert or dismiss case.

1.2 hrs

04/21/2020. Preparation and filing of corrected, amended petition schedules and withdrawal of previously filed amendments.

.9 hrs

Costs- Filing fee\$31.00

04/21/2020. Preparation for telephonic appearance on Motion to Convert/ Dismiss. Motion for Stay Relief and Motion to Sell. 4.7 hrs

04/21/2020. Communication with debtor regarding amount of car payment and the proof of husband's income. Same forwarded to CPA. (FS) .2 hrs

04/21/2020. Communications with Anthony Nini, CPA, relative to prospective plan feasibility.

04/21/2020. Preparation and forwarding of correspondence with Cory Gilman, Esquire, attorney for Buyers of debtor's Avalon property regarding status of Motion for Authorization to Sell said property and requesting Buyers' reply regarding same. .4 hrs

04/21/2020. Preparation and forwarding of hearing status to debtor. .5 hrs

04/21/2020. Receipt of Summons for Adversary Complaint.

.1 hrs

04/22/2020. Communications with debtor's spouse relative to outstanding items required by the U.S. Trustee. (FS)

04/22/2020. Correspondences and communications with Jeff Sponder, Esquire, regarding Retention Application for Anthony Nini, CPA. Communications with Mr. Nini regarding same. .4 hrs

04/24/2020. Correspondences and communications regarding retention of Anthony Nini, CPA's retention and communications with Jeff Sponder, Esquire, regarding same. .5 hrs

04/26/2020. Receipt and review of Supplemental Certification in Support of Retention of Anthony Nini, CPA. .2 hrs

04/28/2020. Receipt of Order Granting Application to Employ Anthony Nini, CPA, and forwarding of same to him. .2 hrs

04/29/2020. Receipt and review of revised Certification in Support of Application for Retention of Anthony Nini, CPA. .2 hrs

04/30/2020. Communication with CPA on the information requested by Trustee. .2 hrs 04/30/2020. Transmittal of Supplemental Certification to Jeff Sponder, Esquire. .4 hrs

04/30/2020. Follow-up request to debtor for remaining information required by the U.S. Trustee relative to confirmation of debtor's spouse's income. .3 hrs

05/6/2020. Communications with Saul Steinberg, Esquire, relative to the status of the sale of debtor's Avalon property and review of email chain relative to same. .3 hrs

05/13/2020. Correspondences and communications with Jeff Sponder, Esquire, relative to the Supplemental Certification for Anthony Nini, CPA. .5 hrs

05/14/2020. Receipt and review of final Supplemental Certification in Support of Application for Retention of Anthony Nini, CPA and communications with Jeff Sponder, Esquire, regarding same. .5 hrs

05/14/2020. Filing of Supplementary Information relative to Anthony Nini, CPA's retention with the Court. . 5 hrs

05/14/2020. Preparation of transmittal letter forwarding Summons and Notice of Pre-trial Conference and Complaint to counsel for CEBV, LLC. .7 hrs Costs-Postage-\$1.04

Copies- 16 copies @ \$.20/copy \$3.20

05/15/2020. Correspondences and communications with Anthony Nini, CPA, regarding provision of verification of debtor's spouse's income to the U.S. Trustee. Suggested

- obtaining a certification from debtor's spouse for provision to Jeff Sponder, Esquire, and drafted and provided a sample of same.

 1.3 hrs
- 05/16/2020. Communication with Trustee relating to the proposed settlement with CEBV, LLC.
- 05/17/2020. Correspondences and communications with Anthony Nini, CPA, and Jeff Sponder, Esquire, relative to providing proof of debtor's spouse's income. .7 hrs
- 05/18/2020. Communications with debtor, debtor's spouse and CPA relative to provision of proof of spouses' income and correction of MOR's and payment of Trustee's fees by Friday, 05/22/2020, filing of 04/2020 MOR for which Mr. Sponder will agree to adjourn Trustee's Motion to 06/2/2020 at 10:00am.
- 05/18/2020. Preparation of draft reply correspondence to Jeff Sponder, Esquire, relative to final outstanding items and forwarding of same to debtor and CPA to review and advise as to acceptability and receipt of authorization to forward same to Jeff Sponder, Esquire. .5 hrs
- 05/18/2020. Correspondence and communications with Mr. Sponder regarding adjournment of the Trustee's Motion to Dismiss to 06/2/2020.
- 05/18/2020. Receipt and review of proposed Settlement Agreement with CEBV, LLC.1.1 hrs
- 05/19/2020. Receipt of request to extend the time to answer Adversary Complaint from counsel for CEBV, LLC. Executed and returned same for filing. .5 hrs
- 05/20/2020. Receipt of request for copy of Adversary Complaint from Saul Steinberg, Esquire, and forwarded same to him. .3 hrs
- 05/20/2020. Received and forwarded copy of debtor's check register to U.S.Trustee's office.(FS)
- 05/21/2020. Follow-up with debtor for proof of payment of U.S. Trustee's fees due...2 hrs
- 05/21/2020. Called Mr. Nini for assistance and finding out if U.S. Trustee's fees paid. .1 hrs
- 05/22/2020. Filing of Monthly Operating Reports for April, 2020. (FS) .5 hrs
- 05/25/2020. Drafted amendments to Schedules I and J and forwarded same to debtor for review and approval.

05/26/2020. Correspondences and communication between Rebecca McDowell, Esquire and debtor relative to the sale and request for verification/clarification that sale is still moving forward.

.5 hrs

05/26/2020. Correspondences and communications with Saul Steinberg, Esquire, and Christopher Fallon, Esquire, relative to CEBV, LLC relative to draft of final version of the settlement agreement with CEBV, LLC and debtor.

05/28/2020. Correspondences and communications with Jeff Sponder, Esquire, regarding outstanding proof of trustee payments and petition amendments. . . . 2 hrs

05/28/2020. Communicated with debtor as to need to file amendments; received authorization from debtor and filed same with court.

05/28/2020. Received and forwarded proof of payment of U.S. Trustee fees to Jeff Sponder, Esquire. .2 hrs

05/29/2020. Correspondences and communications with Jeff Sponder, Esquire regarding debtor's check paying US Trustee's fees not being from debtor's DIP account. .2 hrs

05/29/2020. Correspondences and communications with Tony Nini, CPA, relative to the fair market value of the Avalon property.

05/29/2020. Correspondences and communications with Jeff Sponder, Esquire regarding debtor's Schedules I & J and the requirement that the debtor's spouse's income be included in Schedule I and discussion of same and schedule amendment.

05/29/2020. Review of email chain from Saul Steinberg, Esquire, relative to status of sale of debtor's Avalon property. .2 hrs

05/29/2020. Preparation and forwarding of correspondences to debtor once again explaining the need to satisfy the requirements of the bankruptcy code to provide information about and evidence of her spouse's income. and the urgent need to rectify petition schedule deficiencies to continue to prosecute her bankruptcy and the consequences of her failure to do so. . .6 hrs

05/29/2020. Correspondences and communications with Tony Nini, CPA, regarding the need for debtor's bank statements for the MOR's.

05/29/2020. Correspondences and communications with debtor and debtor's spouse relative to the requirement that debtor conform to the Operating Guidelines, and conform to the requirements set forth therein including the use of the DIP account and other items set forth in the guidelines.

1.0 hrs

05/29/2020. Receipt and review of debtor's spouses' continued direct communications with Jeff Sponder, Esquire, regarding the issues relating to the requirements of the Operating Guidelines and the bankruptcy code, and dealing with debtor's spouse's continuous allegations that debtor was not advised of these requirements despite debtor being provided on numerous occasions (by this office and the U.S. Trustee's Office), with the US Trustee's

Chapter 11 Operating Guidelines and being requested to familiarize herself with the information set forth therein to be able to remain in Chapter 11.

05/29/2020. Discussions with Rebecca McDowell, Esquire, relative to sale of Avalon property and stay relief motion.

06/1/2020. Receipt and review of correspondence from Jeff Sponder, Esquire, regarding review of MOR's and outstanding U.S. Trustee fees for the first quarter, 2020, requesting an explanation as to why the ending cash balance for April, 2020 was not in excess of \$10,000.00 in view of wat the debtor's schedules indicated as income and expenses and asking if the debtor had made any post-petition mortgage payments and requesting filing of an amended Schedule I reflecting debtor's spouses's income.

06/1/2020. Transmittal of Mr. Sponder's email to debtor and Anthony Nini, CPA for immediate reply in an effort to satisfy US Trustee requests and avoid case dismissal or conversion; communications with Mr. Nini about satisfying these requests emphasizing the need for debtor's spouses's income for inclusion in the amended Schedule I. . .6 hrs

06/1/2020. Receipt and review of correspondences and communications regarding debtor's settlement with CEBV, LLC from Saul Steinberg, Esquire and Christopher Falon, Esquire, and the status of the execution of settlement documents by debtor. .2 hrs

06/1/2020. Communications and correspondences with Mr. Nini, CPA, regarding obtaining the necessary spousal income information from debtor's spouse so that the amended schedules could be prepared and filed immediately.

.5 hrs

06/1/2020. Prepared and forwarded correspondence to Mr. Sponder in reply to his forwarding debtor's spouse's email to him, advising him that I was working on preparing and filing the necessary amended schedules.

.3 hrs

06/1/2020. Receipt and review and Mr. Nini's answers to Mr. Sponders questions relative to the MOR's and the amended schedules; correspondences and communications with Mr. Nini regarding same and the provision of answers to Mr. Sponder.

1.1 hrs

06/1/2020. Receipt and review of email correspondences between Tony Nini, CPA, and Saul Steinberg, Esquire, relative to debtor spouses's income for inclusion in the amended petition schedules with the understanding that if the debtor required a greater contribution for plan funding, same would be provided by her spouse.

.5 hrs

06/1/2020. Drafting of corrected, amended Schedules I and J and forwarding of same to debtor for review and approval prior to filing with Court. .5 hrs

- 06/1/2020. Filed corrected, amended Schedules I and J and withdrew previously filed amended schedules. .5 hrs
- 06/1/2020. Correspondences and communications with Christopher Fallon, Esquire, Saul Steinberg, Esquire, regarding settlement of CEBV, LLC Claim and Adversary Proceeding.
- 06/1/2020. Final review and execution of Consent Order Resolving Claim and Adversary Proceeding and transmittal of same to Christopher Fallon, Esquire.
- 06/1/2020. Transmittal of Consent Order Resolving Claim and Adversary Proceeding to Jeff Sponder, Esquire, and receipt and review of his questions concerning same. . . 3 hrs
- 06/1/2020. Receipt and review of correspondence and communication between Jeff Sponder, Esquire and Christopher Fallon, Esquire, wherein Mr. Sponder's questions/concerns were attempted to be addressed. . 2 hrs
- 06/1/2020. Preparation and forwarding of correspondence to Jeff Sponder, Esquire, addressing his initial email on this date with answers to his questions concerning the MOR's and amendments needed for the petition in order for the Trustee's Motion to Dismiss to be withdrawn; review of Mr. Sponder's email to the Court withdrawing the Motion to Dismiss.
- 06/2/2020. Receipt of correspondence from Cory Gilman, Esquire, attorney for the Buyers of the debtor's Avalon property, advising that his clients had decided not to proceed with purchasing the debtor's Avalon property; transmittal of said correspondence to debtor and Saul Steinberg, Esquire.
- 06/2/2020. Correspondences and communications with debtor and debtor's spouse relative to the sale of the Avalon property.

 .6 hrs
- 06/2/2020. Appearance of Motion to Convert/ Dismiss. Motion was withdrawn. 1.5 hrs Costs- Court Solutions fee to participate virtually \$50.00
- 06/8/2020. Correspondences and communications with opposing counsel, U.S. Trustee's Office and the Court relative to adjournment request of Motions to Vacate Stay and Motion to Sell to 07/14/2020. (FS)

 .4 hrs
- 06/8/2020. Correspondences and communications with opposing counsel, U.S. Trustee's Office and the Court relative to adjournment request of Motion to Sell to 07/14/2020.(FS) . 4 hrs
- 06/8/2020. Review of email from Mr. Nini to debtor relative to discussing proposed plan of reorganization.
- 06/10/2020. Receipt and review of IRS Claim #5 and transmittal of same to CPA and debtor to review.

06/18/2020. Filing of Monthly Operating Reports for May, 2020. (FS)

.5 hrs

06/29/2020. Review of correspondences between Jeff Sponder, Esquire and debtor's spouse regarding a \$10,000.00 deposit into debtor's DIP account.

06/29/2020. Review of correspondence from Christopher Fallon, Esquire, relative to dismissal of Adversary Proceeding.

06/29/2020. Drafting of Stipulation of Dismissal with Prejudice to close Adversary Proceeding and forwarding same to counsel for CEBV, LLC for review. .5 hrs

06/30/2020. Preparation and forwarding of follow-up email to debtor requesting review and consent to enter into Consent Order Resolving Stay Vacation motion of T. Welch. . . 3 hrs

06/30/2020. Transmittal of proposed Consent Order to counsel for CEBV, LLC for any suggested input relative to same in consideration of the interests of CEBV, LLC and the settlement agreement terms.

06/30/2020. Preparation and forwarding of follow-up email to debtor relating to the provision of information requested by Jeff Sponder, Esquire, in consideration of the withdrawal of the Motion to Dismiss/Convert;.

06/30/2020. Preparation and filing of Motion to Withdraw as Counsel for Debtor. N/C

06/30/2020. Preparation and filing of Application for Allowance of Fees. 2.0 hrs

07/1/2020. Receipt and review of debtor's email indicating her unwillingness to acknowledge that her spouse had told my staff that he threatened me with harm and my reply to same to debtor.

.5 hrs

07/6/2020. Receipt and review of correspondence from Mr. Sponder regarding the Application for compensation.

07/6/2020. Receipt, review and reply to Saul Steinberg's correspondence relative to the pending stay vacation motion including my request to be provided with the status of the marketing of the Avalon property for sale so that supplemental support to motion opposition could be filed; I advised of my willingness to continue to assist the debtor as counsel in regard to the sale and in opposing the motion if debtor's husband stopped giving me a hard time.

.7 hrs

07/6/2020. Preparation and forwarding of correspondence to Christopher Fallon, Esquire, relative to joining in on the opposition to the stay vacation motion in view of the commonality of interests of CEBV, LLC and the debtor regarding selling the Avalon property.

2 hrs

07/82020. Preparation and forwarding of follow-up correspondence to Saul Steinberg, Esquire, and debtor relative to obtaining a response to my 7/6/2020 email regarding remaining as debtor's counsel and the status of marketing the Avalon property and whether

or not another Buyer was interested and opposing the stay vacation motion.

.4 hrs

07/8/2020. Receipt and review of reply of Mr. Steinberg that he was hopeful that an adjournment of the stay motion could be obtained pending debtor obtaining new counsel; replied to this correspondence indicating that the movant's attorney was anxious to proceed and, in my opinion, would not agree to such an adjournment.

3 hrs

07/8/2020. Prepared and forwarded correspondence to Tony Nini, CPA, requesting a Certification from him of his Excel analysis of the sale proceeds to be realized by debtor by an arms' length, sale of the Avalon property as opposed to a Sheriff's Sale of same to file as support in opposition to the stay vacation motion to illustrate the benefits to debtor's estate and creditors to be realized by permitting debtor some additional time to sell the property.

.5 hrs

07/8/2020. Revision of Application for Allowances.

BALANCE DUE

2.5 hrs

\$31,508.84

| Attorneys' Fees- Paralegal Fees- 122.8 hours @ \$350.00/hour= 12.0 hours @ \$175.00/hour= | | \$42,980.00 2,100.00 |
|---|---------------|-------------------------|
| Costs: Filing fees | \$593.00 | |
| Postage | 25.04 | |
| Copies | 144.20 | |
| Court solutions Fees | 100.00 | |
| PACER | 8.60 | |
| Parking | 33.00 | |
| Travel Time: 3.0 hours @ \$175.00/hour | <u>525.00</u> | |
| | | 1,428.84 |
| Total | | \$46,508.84 |
| Less-Retainer | | 15,000.00 |
| | | |